

served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.” 18 U.S.C. § 3161(h)(7)(A).

6. Defendant, through counsel, has discussed this matter with assistant United States attorney Stephen Casey. Mr. Casey has no objection to Defendant’s request.

WHEREFORE, Defendant respectfully requests this Honorable Court extend the time in which to file pretrial motions by a period of thirty (30) days and continue the evidentiary hearing to a date to be determined by this Court.

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

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CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2013, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court’s electronic filing system upon Mr. Stephen Casey, assistant United States attorney.